Exhibit B

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From: Jennifer Blecher

Sent: Friday, August 18, 2023 10:59 AM

To: Sant, Geoffrey; Lee, Carol; Ray, III, Hugh M.; Smith, Andrew C.

Cc: Amiad Kushner; Xintong Zhang

Subject: Huzhou Chuangtai Rongyuan Inv. Mgmt. Partnership, et al. v. Qin, No. 21-cv-9221-KPF – Mr. Qin's

Cell Phones

Counsel,

I write to confirm that yesterday, Mr. Qin's Chinese cell phone was taken into possession by a third-party vendor during the Court hearing and that his U.S. cell phone was handed over to the vendor without incident last night at the Seiden Law office in your presence, as well as to follow up on the status of both phones. The vendor had stated that it would only take a few hours to image those phones and that they would then be returned to Mr. Qin. Please provide us with the vendor's contact information and let us know when we can expect to receive the phones back.

Separately, our position is that the data from those phones should not be searched until the parties have met and conferred regarding an appropriate protocol that would respect any issues related to attorney-client or other applicable privilege or protection. Please let us know your availability for a call to discuss that issue.

Regards,

Jennifer

Jennifer Blecher, Esq.

Senior Counsel

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